

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

U.S. MAGISTRATE COURT
JSH - SDTY

OCT -6 2014 CLR

Southern
United States of America
v.

Flores, Marco Antonio

Case No. 5:14mj1287-1

David J. Bracey, Clerk
Laredo Division

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 10/3/2014 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

Title 21, USC 841 (a)(1)

Offense Description

Knowingly and unlawfully possess with
the intent to distribute a controlled
substance listed under Schedule I, Title
II, of the Controlled Substances Act, to
wit: approximately 423.5 kilograms of
marijuana

This criminal complaint is based on these facts:

See Attachment

☒ Continued on the attached sheet.

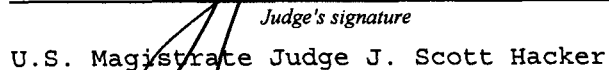
Sworn to before me and signed in my presence.

Date: 10/6/2014City and state: Laredo, TX


Complainant's signature

Task Force Officer Juan M. Garcia

Printed name and title



Judge's signature

U.S. Magistrate Judge J. Scott Hacker

Printed name and title

Attachment to the Complaint of Marco Antonio FLORES

On October 3, 2014, at approximately 7:30 p.m., a white 2008 Chevrolet 3500 pulling a yellow 1999 trailer approached the U.S. Border Patrol (USBP) B-35 Checkpoint, located north of Laredo, Texas. A USBP Agent conducted an immigration inspection of the driver who was later identified as Marco Antonio FLORES. FLORES stated that he was a United States Citizen traveling to Uvalde, Texas. During the immigration inspection a USBP canine conducted a free air sniff of the vehicle and trailer. The canine alerted to the presence of contraband and/or concealed people in the vehicle and/or trailer. The USBP Agent conducting the immigration inspection referred the vehicle to secondary where a search of the vehicle and trailer was conducted. While conducting the search a USBP Agent discovered forty-one (41) bundles wrapped in duct tape within a large cylinder container on the trailer. A field test of the bundles was positive for marijuana.

FLORES was advised of his Miranda Rights in English by TFO Juan Garcia and witnessed by TFA Travis Doe. FLORES immediately stated that before he requested his lawyer that he wanted to make a deal to provide information on illegal activity in exchange for being prosecuted and going to jail. TFO Garcia and TFA Doe spoke with FLORES regarding what information he had, however, FLORES would not provide substantial evidence of knowledge of illegal activity that Agents could corroborate. FLORES stated that he had no knowledge of the narcotics hidden in the container. FLORES stated that the truck belonged to a friend of his named, Enoch DIAZ, from San Antonio, Texas. FLORES would not state where he was coming from or where he was going. At this time Agents concluded that FLORES would not be cooperative in the investigation and terminated the interview. FLORES continued attempts to "make a deal" with Agents until he was remanded to the custody of the Webb County Sheriff's at the Webb County Jail.

FLORES was placed under arrest and charged with knowingly and unlawfully conspiring to possess with the intent to distribute a controlled substance, listed under Schedule I of the Controlled Substance Act, to wit: approximately 432.5 kilograms of marijuana.